

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

MEDTECH PRODUCTS INC.,

Plaintiff,

v.

RANIR, LLC,

Defendants.

Civil Action No. 2:15-cv-02584-JPM-tmp

JURY DEMANDED

DEFENDANT’S UNOPPOSED MOTION AND SUPPORTING MEMORANDUM FOR
EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF’S COMPLAINT

Defendant Ranir, LLC (“Ranir”), by and through counsel, moves the Court for a 30-day extension of time up to and including October 29, 2015, for Ranir to file a response to the Plaintiff, Medtech Products Inc.’s (“Medtech”) Complaint. In support of this Motion, Ranir states as follows:

1. Medtech filed its Complaint on September 8, 2015, and provided a copy of the Complaint to a Ranir staff person on September 8, 2015. The Complaint alleges that Ranir infringes two patents owned by Medtech (“Patents-In-Suit”).

2. At the time this lawsuit was filed, Ranir was unaware that Medtech intended to file a complaint in this District asserting infringement of the Patents-in-Suit. The Patents-In-Suit are lengthy, contain 96 patent claims, and cite to dozens of References. The Complaint does not identify which of the 96 patent claims are allegedly infringed. Ranir therefore respectfully requests this extension to allow recently-retained counsel to investigate the claims and prepare a

complete response addressing all issues presented in the Complaint and by the litigation more generally.

3. After initial discussions between counsel, it appears that expedited resolution of this matter through an agreement between the parties is unlikely. Accordingly, on September 21, 2015, Ranir and Medtech's counsel conferred and Medtech agreed that it would not oppose Ranir's request for a thirty-day extension of time for Defendant to answer or otherwise respond to the Complaint. Such agreement is reflected in the Certificate of Consultation set forth hereinbelow in accordance with the Local Rules.

4. By this Motion, Ranir does not waive any defenses it has or may have to the claims and allegations set forth in the Complaint, all of which are expressly reserved.

WHEREFORE, premises considered, Ranir respectfully requests that the Court grant this unopposed Motion and extend the time for Defendant to answer or otherwise respond to Medtech's Complaint up to and including October 29, 2015. A proposed Order granting this Motion is being submitted to the Court contemporaneously herewith.

Dated: September 24, 2015.

Respectfully submitted,

/s/ Douglas F. Halijan

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CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), I hereby certify that on September 21, 2015, counsel for parties consulted via telephone and that counsel for Plaintiff expressly consented to the relief requested in this Motion. This Motion for Extension of Time is therefore UNOPPOSED.

/s/ Douglas F. Halijan _____

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2015, the foregoing electronically filed document was served upon all counsel of record via the Court's notice of electronic filing:

/s/ Douglas F. Halijan _____